

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

MELVIN NEWSOME, et al.

Plaintiffs,

v.

UP-TO-DATE LAUNDRY, INC., et al.

Defendants.

Civil Action No. S01-2257 (WDQ)

**PLAINTIFFS' UNOPPOSED MOTION
FOR APPROVAL OF NOTICE TO CLASS**

Plaintiffs hereby request the Court approve the attached (1) Notice of Settlement of Class Action, (2) Claim Form, (3) Opt Out Form, and (4) text of newspaper advertisement. Plaintiffs have provided the attached documents to defendants for review, and defendants do not object to them.

1. The parties have previously submitted a proposed Consent Decree and have jointly moved that the Court give it preliminary approval and set a date for a Fairness Hearing. Paragraph 28 of the Decree provides that "the parties shall present" the class Notice (as well as the Claim Form and the Opt Out Form) to the Court for approval. These documents are attached, as is the proposed text of the newspaper advertisement required by Paragraph 28.

2. Plaintiffs are prepared to notify the class as soon as the Court gives its preliminary approval to the proposed Consent Decree, sets a date for the Fairness Hearing, and approves the class Notice and related documents.

3. There are approximately 1500 members of the class, as defined in Paragraph 7 of the Consent Decree, and addresses are available for virtually all of these individuals.

Plaintiffs have retained a firm that specializes in administering class action settlements, Settlement Services, Inc. of Tallahassee, Florida, which will mail a package containing the Notice, Claim Form, Opt Out Form, and a copy of the proposed Consent Decree to each class member for whom an address is available. In addition, this material will be mailed to all individuals who respond to the newspaper advertisement by calling the toll free number that Settlement Services has established (and that appears in the advertisement and the Notice).

4. The Claim Forms and Opt Out Forms will be returned to Settlement Services at the address that appears on those forms.

5. Class counsel will supervise all work performed by Settlement Services.

6. The parties understand that they will need to demonstrate, prior to the Fairness Hearing, why they believe that the proposed Consent Decree is fair, adequate and reasonable. As the parties noted in their Joint Motion for Preliminary Approval of Consent Decree, the Fairness Hearing will take place about 120 days following preliminary approval, which should mean that the Fairness Hearing can take place in November 2004. This should permit sufficient time for final approval to be given by December 31, 2004, if the Court deems it appropriate. It is crucial that any final approval be given by that date (see proposed Consent Decree, ¶¶ 17 and 18).

7. A proposed order, which covers all pending matters, is attached.

/s/

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